

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	Bankruptcy No. 17-15150-jkf
CARLA RENEE BAYNARD	:	Chapter 13
Debtor	:	
	:	
PUBLIC STORAGE	:	Contested Matter
Movant	:	
	:	
v.	:	
	:	
CARLA RENEE BAYNARD	:	

STIPULATION


AND NOW, this 27th day of August, 2019, it is hereby **STIPULATED** and **AGREED**, by and between all parties that Debtor Carla Baynard entered into a Lease/Rental Agreement with Creditor Public Storage on June 2, 2017 for use of a storage unit. Debtor failed to issue payment to Creditor for rent and other fees for use of the storage unit from April 20, 2018 until the present, totaling collectable fees of \$3,008.96. It is **FURTHER STIPULATED** and **AGREED**, by and between all parties, that Debtor continues to fail to make payments, and in accordance with the Lease/Rental Agreement, upon the Court's approval of this Stipulation, Creditor Public Storage is permitted to enter Debtor's unit to recover and dispose of the contents pursuant to its lien rights stated in the Lease/Rental Agreement.

BY: /s/ Joseph L. Quinn, Esquire
Joseph L. Quinn, Esquire
Attorney for Debtor,
Carla Renee Baynard

BY: /s/ Ryan Michaleski, Esquire
Ryan Michaleski, Esquire
Attorney for Creditor,
Public Storage

BY: /s/ Polly A. Langdon, Esquire
Polly A. Langdon, Esquire
Attorney for Chapter 13 Trustee, The foregoing stipulation is hereby approved.
Scott F. Waterman

Dated: 8/27/19



Jean FitzSimon
United States Bankruptcy Judge